

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

) CRIMINAL NO. 03CR 10395 - WGY
)
UNITED STATES OF AMERICA) VIOLATIONS:
) 18 U.S.C. §922(a)(6)
) False Statement to Obtain Firearms
)
V.)
) 18 U.S.C. §922(g)(3)
KRIS ST. ONGE) Possession of a Firearm by a User
) of a Controlled Substance or a
) Person Addicted to a Controlled
) Substance

INDICTMENT

COUNT ONE: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about December 13, 2000, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Ceska Zbrojovka Firearms CZ 75B 9mm semi-automatic pistol bearing serial number 5431N, from Fairground Trader, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with

respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT TWO: **(18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)**

The Grand Jury charges that:

On or about January 10, 2001, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson 908 9mm semi-automatic pistol bearing serial number TDM3869, from Fairground Trader, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT THREE: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about March 17, 2001, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson 908 9mm semi-automatic pistol bearing serial number VJB4475, from Fairground Trader, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT FOUR: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about July 24, 2001, at Middleboro, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson CS40 .40 caliber semi-automatic pistol bearing serial number VJB4042, from Middleboro Gun Shop, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT FIVE: (18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)

The Grand Jury charges that:

On or about July 27, 2001, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a Smith and Wesson SW40P .40 caliber semi-automatic pistol bearing serial number PBF5181, from Fairground Trader, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT SIX: **(18 U.S.C. §922(a)(6) - False Statement to Obtain Firearms)**

The Grand Jury charges that:

On or about July 28, 2001, at Middleboro, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, in connection with the acquisition of a firearm, to wit: a SigSauer P-239 .40 caliber semi-automatic pistol bearing serial number SA485376, from Middleboro Gun Shop, did knowingly make a false and fictitious written statement on Department of the Treasury Form 4473 by signing a "Certificate of Transferee" wherein he certified that he was the "actual buyer" of this firearm, and that he was not an unlawful user of, or addicted to, a controlled substance. These statements were intended and likely to deceive the dealer with respect to a fact material to the lawfulness of the sale, namely the identity of the actual purchaser of this firearm, and KRIS ST. ONGE'S eligibility to purchase a firearm. In truth and in fact, as KRIS ST. ONGE knew, he was not the actual purchaser of this firearm, and he was a user of and addicted to a controlled substance.

All in violation of Title 18, United States Code, Section 922(a)(6) and Title 18, United States Code, Section 2.

COUNT SEVEN: (18 U.S.C. §922(g)(3) - (Possession of a Firearm by a User of a Controlled Substance or a Person Addicted to a Controlled Substance)

The Grand Jury charges that:

On or about December 13, 2000, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, did, knowingly possess in and affecting commerce a firearm, to wit: a CZ 75B 9mm semi-automatic pistol bearing serial number 5431N, while he was a user of and addicted to a controlled substance, to wit, heroin.

All in violation of Title 18, United States Code, Section 922(g)(3) and Title 18, United States Code, Section 2.

COUNT EIGHT: (18 U.S.C. §922(g)(3) - (Possession of a Firearm by a User of a Controlled Substance or a Person Addicted to a Controlled Substance)

The Grand Jury charges that:

On or about July 27, 2001, at Brockton, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, did, knowingly possess in and affecting commerce a firearm, to wit: a Smith and Wesson SW40P .40 caliber semi-automatic pistol bearing serial number PBF5181, while he was a user of and addicted to a controlled substance, to wit, heroin.

All in violation of Title 18, United States Code, Section 922(g)(3) and Title 18, United States Code, Section 2.

COUNT NINE: (18 U.S.C. §922(g)(3) - (Possession of a Firearm by a User of a Controlled Substance or a Person Addicted to a Controlled Substance)

The Grand Jury charges that:

On or about July 28, 2001, at Middleboro, in the District of Massachusetts,

KRIS ST. ONGE,

defendant herein, did, knowingly possess in and affecting commerce a firearm, to wit: a SigSauer P-239 .40 caliber semi-automatic pistol bearing serial number SA485376, while he was a user of and addicted to a controlled substance, to wit, heroin.

All in violation of Title 18, United States Code, Section 922(g)(3) and Title 18, United States Code, Section 2.

A TRUE BILL

Edward J. Murphy 12/17/03
FOREPERSON OF GRAND JURY



Seth P. Berman
Assistant U.S. Attorney

DISTRICT OF MASSACHUSETTS, Boston, December 17, 2003. ② 3:47 PM

Returned into the District Court by the Grand Jurors and filed.



Bex Brown
Deputy Clerk

Criminal Case Cover Sheet**U.S. District Court - District of Massachusetts**Place of Offense: Category No. II Investigating Agency ATFCity Brockton and Middleboro Related Case Information:County Plymouth Superseding Ind./ Inf. N/A Case No. N/ASame Defendant N/A New Defendant N/AMagistrate Judge Case Number N/ASearch Warrant Case Number N/AR 20/R 40 from District of N/A**Defendant Information:**Defendant Name KRIS ST. ONGE Juvenile Yes No

Alias Name _____

Address 12 Lilly Avenue, Brockton, MA 02301Birth date: 1966 SS#: 8537 Sex: M Race: WH Nationality: USA

Defense Counsel if known: _____ Address: _____

Bar Number: _____

U.S. Attorney Information:AUSA Seth P. Berman Bar Number if applicable 629332Interpreter: Yes No List language and/or dialect: _____Matter to be SEALED: Yes No Warrant Requested Regular Process In Custody**Location Status:**

Arrest Date: _____

 Already in Federal Custody as _____ in _____. Already in State Custody _____ Serving Sentence Awaiting Trial On Pretrial Release: Ordered by _____ on _____.Charging Document: Complaint Information IndictmentTotal # of Counts: Petty Misdemeanor Felony Nine

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.Date: 12/17/03 Signature of AUSA: Seth P. Berman

~~JS 45 (5/97) - (Revised USAO MA 3/25/02) Page 2 of 2 or Reverse~~

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant KRIS ST. ONGE**U.S.C. Citations**

<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1 <u>18 U.S.C. §922(a)(6)</u>	<u>False Statements to Obtain Firearms</u>	<u>One through Six</u>
Set 2 <u>18 U.S.C. §922(g)(3)</u>	<u>Possession of a Firearm by a User of a</u>	<u>Seven through Nine</u>
Set 3 _____	<u>Controlled Substance or a Person Addicted to</u>	_____
Set 4 _____	<u>a Controlled Substance</u>	_____
Set 5 _____	_____	_____
Set 6 _____	_____	_____
Set 7 _____	_____	_____
Set 8 _____	_____	_____
Set 9 _____	_____	_____
Set 10 _____	_____	_____
Set 11 _____	_____	_____
Set 12 _____	_____	_____
Set 13 _____	_____	_____
Set 14 _____	_____	_____
Set 15 _____	_____	_____
ADDITIONAL INFORMATION: _____		

